

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) Cr. No. 15-10338-FDS
 v.)
)
 OSCAR NOE RECINOS-GARCIA,)
 A/K/A "PSYCHO," ET AL.)
 Defendants.)

STATUS REPORT REGARDING DISCOVERY

Pursuant to the Court's Order, dated April 27, 2016, the government provides the following status report regarding discovery. The government has been producing discovery on a rolling basis approximately once a month. The government will be making its third Global Discovery production this week, which includes: 1,190 documents totaling 2,787 pages, 8,334 audio files,¹ 5,120 text messages from CW-1's cell phone; 817 audio/video files; and the contents of a cell phone memory card.

The government has consulted with Michael Andrews, the First Circuit Case Budgeting Attorney, who has been enlisted by the Court to assist with coordinating discovery issues in this case, and has been advised that the respective institutions where the defendants are currently housed do not yet have adequate facilities in place that would enable the defendants to

¹ The audio files include 4,529 consensual Title III calls involving CW-1's cell phone, which were previously produced in .wav file format. The government recently obtained a copy of those calls in a platform that allows searching by date and telephone number, and we are re-producing them in that format.

appropriately review discovery. The government is preparing that Global Discovery to be produced as soon as the government is advised that those computer facilities are in place.

The government estimates that, including Global Discovery 3, it will have produced roughly 75 percent of the discovery pertaining to the pre-indictment investigation that is subject to disclosure at this time. In addition, the government has produced a substantial amount of early Jencks material. The government's investigation is ongoing and it will continue producing discovery on a monthly, rolling basis.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

Date: June 1, 2016

By: /s/ Peter K. Levitt
Peter K. Levitt
Christopher Pohl
Rachel Y. Hemani
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I, Rachel Y. Hemani, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: June 1, 2016

/s/ Rachel Y. Hemani

Rachel Y. Hemani

Assistant U.S. Attorney